

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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TELECOM BUSINESS SOLUTION, LLC, LATAM	:	Civil Action No.: 22-cv-01761
TOWERS, LLC, AND AMLQ HOLDINGS (CAY),	:	
LTD.,	:	
	:	NOTICE OF MOTION FOR
Petitioners,	:	LEAVE TO FILE UNDER
v.	:	SEAL
	:	
TERRA TOWERS CORP. AND TBS	:	
MANAGEMENT, S.A.,	:	
	:	
Respondents.	:	
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PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Their Motion for Leave to File Their August 16, 2022 Letter to the Court Under Seal (the “August 16 Letter”), Petitioners Telecom Business Solution, LLC, LATAM Towers, LLC, and AMLQ Holdings (Cay) Ltd. (collectively, “Petitioners”), by and through undersigned counsel, hereby move this Court, pursuant to Federal Rule of Civil Procedure 5.2(d), for an Order granting leave to file under seal Petitioners’ August 16 Letter and the exhibit annexed thereto.

Dated: August 16, 2022

Respectfully submitted,

By: /s/ Katherine M. Poldneff

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*Counsel for Petitioner AMLQ Holdings
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 16, 2022, the foregoing was filed through the Court's electronic filing system, which will provide notice of the filing to all counsel of record.

/s/ Gregg L. Weiner

Gregg L. Weiner

*Counsel for Petitioner AMLQ
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